




**LMOS Reply Affidavit – Attachment A**

**CLEC HANDBOOK**

**Southwestern Bell**



Document Info:
Revised: 02-14-01
 Printer Friendly Version
Maintenance & Repair Maintenance & Repair Overview

Revised: 11-04-99

**Maintenance & Repair**

Overview

Trouble Reporting Procedures

Repair of NID

OSS Service Order Posts to Repair and Maintenance Databases

LOC Acceptance Of Trouble Reports On Or After Service Order Due Date

**Overview**

The CLEC will have the ability to report trouble for its end users to the Local Operations Center (LOC) 24 hours a day, 7 days a week. CLEC's end users calling SWBT directly will be referred to their CLEC at the number provided by the CLEC, whenever possible.

**Trouble Reporting Procedures**

When the CLEC (SWBT's customer of record) is advised that trouble exists on one of its CLEC provided services, the CLEC should always verify:

- Its end user's customer premises equipment (CPE) and wiring beyond the demarcation point has been cleared prior to reporting trouble.
- any CLEC provided network elements have been cleared prior to reporting trouble.

The CLEC should contact the LOC with a trouble description. This description must include:

- the nature of trouble
- contact name and number for the CLEC's end user
- contact name and number of the CLEC

Failure to clear CPE trouble prior to initiating repair requests may result in maintenance of

service charges being accessed to the CLEC. In those states where unbundled loops can be ordered without remote test access, and this is contained in the CLEC's contract, the CLEC must provide test results to the LOC at the time the trouble is reported. If the CLEC cannot provide these test results, then SWBT will test the unbundled loop and charge the CLEC for all the time required to test the unbundled loop.

#### **Access for Repairs**

When a 'no access' condition exists on repair visits and repairs cannot be completed, SWBT will leave a door hanger (as directed by the specific state regulatory agency) at the end users premises informing the end user:

- that repairs could not be completed because access to the premises could not be obtained.
- that they need to contact their local service provider in order to arrange for access to the premises for the completion of repairs.

The CLEC will be billed for these non-productive dispatches.

#### **Status of Repairs**

CLECs can use Toolbar-Trouble Administration or Electronic Bonding to verify the status of pending repairs and to issue trouble reports (See Operational Support Systems).

#### **Repair of NID**

If the CLEC requires a SWBT technician to repair SWBT's NID, the CLEC will contact the LOC for repair work.

**Note:** SWBT will not repair any CLEC's NID or any CLEC's connections in SWBT's NID enclosure. Also, SWBT will not interconnect an CLEC's NID to SWBT's NID, an CLEC's ground to SWBT's ground nor an CLEC's NID to its end-user's inside wire.

#### **OSS Service Order Posts to Repair and Maintenance Databases**

In the service order process, the service orders are issued to the downstream SWBT OSSs. The orders will start out in origination status and will change to completion status when the service order is completed and the service is working to the end user. The service order does not post to the repair and maintenance systems at this point. The service order must now post to completion in the CRIS or CABS billing system.

When the service order status changes to 'Posted', the service order will be forwarded to the Repair and Maintenance databases to build the record and reflect that the CLEC is the customer.

Until the service order is loaded into the repair and maintenance systems, the mechanized repair and maintenance interfaces of Electronic Bonding - Trouble Administration and Toolbar - Trouble Administration will not be available for the CLEC to use.

Once the service order is loaded to the repair and maintenance databases, the full functionality of the mechanized interfaces will be available. In the meantime, the CLEC

should report the trouble manually to the Local Operations Center (LOC) at 1-800-220-4818 so that the trouble can be handled and service restored to the end user.

**LOC Acceptance Of Trouble Reports On Or After Service Order Due Date**

The SWBT LOC accepts service effecting Trouble Reports from the CLEC on or after the scheduled Service Order Due Date, under the following conditions:

- Orders related to Unbundled Network Element (UNE) and UNE Switch Ports (UNEP), and service effecting problems associated with these orders, are accepted by the LOC on and after the Due Date. The LOC is open 24 hours-a-day, seven days-a-week.
- All Non-UNEP Orders are normally provisioned by SWBT between 8:00 a.m. and 5:00 p.m. (CST). The LOC accepts service effecting reports after 5:00 p.m. (CST) on the due date of Non-UNEP orders.

**Important:** Prior to 5:00 p.m. on the Due Date, the CLEC should contact the SWBT Local Service Center (LSC) to report trouble on Non-UNEP orders.

- The LOC accepts a service effecting trouble report (on or after the due date) on both UNEP and non-UNEP service if the CLEC is inhibited from utilizing Toolbar - Trouble Administration (Toolbar-TA) or Electronic Bonding (EB) due to problems associated with the service order posting to completion.

**Note:** This guideline does not apply to conversions of the CLEC's Resold Accounts to UNEP. These types of reports can normally be entered via Toolbar - TA or EB.

To report trouble manually, contact the Local Operations Center (LOC) at **1-800-220-4818**.

Here is a list of topics related to service orders:

- Add, alter or change service and/or features
- Inquires relative to rates and charges
- Billing information and/or end user address
- Due date changes or expedites
- Add, alter or change of porting arrangements
- Add, alter or change of access arrangements
- Cancellation of the order
- Pending order Inquires

The CLEC must direct questions about any of these topics to the LSC (not to the LOC) **prior to 5:00 P.M. (CT)**.

The:


- Business LSC can be reached at 1-888-599-0278
- Residence LSC can be reached at 1-800-241-0268



**B**

**LMOS Reply Affidavit – Attachment B**

**CLEC HANDBOOK****Southwestern Bell**

Document Info:
Revised: 02-14-01
 <b>Printer Friendly Version</b>
Maintenance & Repair Trouble Reporting

Revised: 02-28-01

**2.0 Trouble Reporting****2.1 Manual Trouble Reporting Procedures****2.2 Electronic Trouble Reporting Procedures****2.2.1 Unauthorized to Access Error Message in Toolbar-Trouble Administration****2.2.2 Our Records Indicate This Telephone Number Is Not Part Of Your User Profile****2.3 WIREWORX<sup>sm</sup>****2.4 Reporting NXX Problems****2.1 Manual Trouble Reporting Procedures**

CLECs have the ability to report trouble for their end-user customers to the SWBT Local Operations Center (LOC) by either: 1) Calling 1-800-220-4818 or 2) Via the Interactive Voice Response System (1-877-804-1011). For a description of the Interactive Call Tree (IVR) [click here](#). Trouble can be reported to the LOC 24 hours a day, 7 days a week. CLEC end users calling SWBT directly will be referred to their CLEC.

When the CLEC is advised by its end user that trouble exists on one of its services, the CLEC should always verify that its' end user customer's premises equipment (CPE) and wiring beyond the demarcation point has been cleared prior to reporting trouble.

If no trouble is found on the end user's side of the demarcation point, the CLEC should contact the LOC with a trouble description. This description must include:

- the nature of trouble
- a contact name and number for the CLEC's end user
- a contact name and telephone number of the CLEC

The repair commitment will be given to the CLEC based on out-of-service or service affecting



trouble. Failure to clear CPE trouble prior to initiating repair requests referred to SWBT may result in maintenance of service charges being assessed to the CLEC.

Notification of 'no accessibility status' on the end-user premise will be provided to the CLEC. CLEC's will be responsible for coordinating accessibility with end users for all returned work requests.

## 2.2 Electronic Trouble Reporting Procedures

SWBT offers Trouble Administration capabilities via the Southwestern Bell Toolbar application. Trouble Administration provides an electronic operations support system for repair and maintenance functions on resold accounts and special circuits for unbundled network elements.

Trouble Administration allows CLECs to:

- o view the status of pending trouble tickets
- o view circuit history information on telephone numbers
- o view closed trouble tickets
- o request a quick test on basic telephone services
- o issue trouble tickets on circuits and basic telephone lines via a computer graphical user interface (GUI)

Please contact your SWBT CPAT Manager for information on electronic Operations Support Systems such as SWB Toolbar.

New: 11-01-99

### 2.2.1 Unauthorized to Access Error Message in Toolbar-Trouble Administration

In the process of reporting trouble via the Toolbar - Trouble Administration application, if the service order has not posted to completion in the CRIS or CABS billing system, the service order will not have been updated to the repair and maintenance databases.

The Toolbar - Trouble Administration user will receive Error Message 18 - 'Unauthorized to access this information. Contact your support center to report trouble or obtain status information.'

When this error message is received, the CLEC should call the LOC and report trouble manually. The CLEC should provide to the LOC that a recent service order provided the service to the CLEC. The LOC will have the ability to verify that a service order exists to provide the service to the CLEC and will be able to manually enter the report into the repair and maintenance OSSs. To report the trouble manually, contact the Local Operations Center (LOC) at 1-800-220-4818.

New: 02-17-00

### 2.2.2 Our Records Indicate This Telephone Number Is Not Part Of Your User Profile

In the current process of reporting trouble using the Toolbar Trouble Administration (TB/TA) application, a trouble report can not be taken until the service order has posted. This is because the service order will not update to the repair and maintenance databases until it has posted in the CRIS or CABS billing system. With this enhancement, TB/TA will allow the CLEC user to enter service affecting trouble reports on telephone number formatted services (for resale and UNE-P) associated with recent service order activities either in pending or completion status.

Under the new process, a verification message will be returned when an inquiry is submitted for a telephone number formatted circuit not matching the CLEC user profile. This new verification response will be:

**'Our Records Indicate this Telephone Number is not part of your User Profile, do you wish to continue?'**

Upon receipt of this response, the CLEC will be given two options. The CLEC may either enter:

- 'YES' - continue in creating a mechanized trouble report on a telephone number not matching the CLEC user profile; or
- 'NO' - cancel the transaction

The normal functionalities (i.e.; Trouble History, Trouble Ticket Status, MLT Test) currently available for trouble reports entered in Trouble Administration will also be provided on trouble reports entered under the new enhancement.



## 2.3 WIREWORX<sup>sm</sup>

WIREWORX<sup>sm</sup> is a inside wire and jack maintenance service SWBT offers to CLECs who are reselling SWBT basic telephone services. WIREWORX<sup>sm</sup> will also allow CLECs to order wiring and jack installation for their end users for resold basic telephone services.

- With a WIREWORX<sup>sm</sup> agreement, SWBT agrees to diagnose trouble beyond the demarcation point and to repair the inside wiring and jacks at CLEC end-user premises.
- Without a WIREWORX<sup>sm</sup> agreement, SWBT will not perform any inside wire installation or repair for a CLEC.

A WIREWORX<sup>sm</sup> agreement, containing all of the agreement specifics, can be obtained from your SWBT CPAT Manager.



Now: 08-17-99

## 2.4 Reporting NXX Problems

When the CLEC has a problem with a Ported Number not being able to receive calls from particular SWBT NXXs or not being able to call certain SWBT NXXs, the CLEC should determine the appropriate InterOffice Message trunk group that would normally carry that call and report the

trouble to SWBT on the first trunk in the Message Trunk Group.

Since the Telephone number is ported out from SWBT, SWBT will not be able to accept a trouble report on the Telephone number. The Telephone Number is no longer a working SWBT telephone number.

The trouble report can be submitted via either mechanized interface, Electronic Bonding - Trouble Administration or Toolbar - Trouble Administration.

If a mechanized interface is not available for the CLECs use, the report can be manually called to the Local Operations Center (LOC) at 1-800-220-4818.



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**LMOS Reply Affidavit – Attachment C**

## **LMOS HISTORICAL ANALYSIS**

SWBT has done an analysis of the impact of the LMOS sequencing issue on the Performance Measurements. The following assumptions were used in this analysis:

- The roughly 10 percent understatement of the embedded UNE-P base, revealed through the comparison of LMOS and CABS records for UNE-P accounts, was utilized to estimate the number of total UNE-P lines affected by the out-of-sequence problem for the period April 2000 through March 2001.
- SWBT assumed that the trouble report rate for lines affected by the out-of-sequence problem was the same as for the lines unaffected by the out-of-sequence problem. This is a reasonable assumption since there is no evidence or basis for assuming that the report rate should be different for these groups of lines.
- SWBT further assumed that trouble reports for the affected lines were not captured in the performance measurements as trouble reports for any CLEC (whether or not the correct CLEC). Rather, SWBT assumed that those trouble reports were misidentified as SWBT retail trouble reports. This is an extremely conservative estimate since some misidentified trouble reports may have been associated with CLEC to CLEC migrations. To the extent that a trouble report was assigned to the wrong CLEC, the aggregate CLEC trouble report rate would still be correct.
- SWBT then recalculated the results for three PMs: Percent POTS/UNE-P Trouble Report within 10 Days (I-10) of Installation (PM 35), Trouble Report Rate Net of Installation and Repeat Reports (PM 37.1), and Percent Repeat Reports (PM 41). Based on the conservative assumptions detailed above, this increased the CLEC UNE-P lines and trouble reports captured in the performance measurements by about 10 percent. SWBT then decreased the number of retail trouble reports by the same amount that it increased the CLEC trouble reports. Based on the new data, SWBT then recalculated the z-value for each of these performance measurements.
- SWBT did not recalculate data for Missed Repair Commitments (PM 38), Receipt To Clear Duration (PM 39), and Percent Out of Service Less Than 24 Hours (PM 40). SWBT assumed that the results for these performance measurements would not be affected by the recalculation of trouble report data captured in PMs 35, 37.1 and 41. The out-of-sequence problem should not have affected how the trouble report itself was handled, or the speed with which the trouble was resolved. Therefore, there is no reason to believe that the duration or the missed commitments would be different for lines affected by the out-of-sequence problem than for unaffected lines.

As can be seen from the data attached, there was no impact<sup>1</sup> on the results reported for Missouri, with the exception of March 2001 data for PM 35-12 and 41-03. Even there, using the very conservative assumptions described above, the difference between CLEC and retail performance in that month was only 0.5 percent for PM 35-12 (up from a reported difference of 0.33) and 2.23 percent for PM 41-03 (up from a reported difference of 2.19).

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<sup>1</sup> The results, of course, changed. However, there was no shift from parity to out of parity.

**Percent Trouble Reports on N and T Orders within 10 days  
(Original Data)**

Measurement	35 - 09	No. of Orders	Field Work			Z-Value
			All CLECs		SWBT	
			# Trouble Reports	% Trouble Reports	% Trouble Reports	
	Apr-00	0	0	n/a	4.08%	n/a
	May-00	0	1	n/a	3.73%	n/a
	Jun-00	0	0	n/a	4.00%	n/a
	Jul-00	0	0	n/a	3.99%	n/a
	Aug-00	0	0	n/a	3.98%	n/a
	Sep-00	0	0	n/a	4.28%	n/a
	Oct-00	0	0	n/a	3.41%	n/a
	Nov-00	0	0	n/a	3.36%	n/a
	Dec-00	0	1	n/a	3.50%	n/a
	Jan-01	0	0	n/a	2.97%	n/a
	Feb-01	0	0	n/a	4.12%	n/a
	Mar-01	0	0	n/a	3.83%	n/a

**Percent Trouble Reports on N and T Orders within 10 days  
(Revised Data)**

Measurement	35 - 09	Field Work				Z-Value
		All CLECs		SWBT		
		No. of Orders	# Trouble Reports	% Trouble Reports	% Trouble Reports	
	Apr-00	0	0	#DIV/0!	4.08%	#DIV/0!
	May-00	0	1	#DIV/0!	3.73%	#DIV/0!
	Jun-00	0	0	#DIV/0!	4.00%	#DIV/0!
	Jul-00	0	0	#DIV/0!	3.99%	#DIV/0!
	Aug-00	0	0	#DIV/0!	3.98%	#DIV/0!
	Sep-00	0	0	#DIV/0!	4.28%	#DIV/0!
	Oct-00	0	0	#DIV/0!	3.41%	#DIV/0!
	Nov-00	0	0	#DIV/0!	3.36%	#DIV/0!
	Dec-00	0	1	#DIV/0!	3.50%	#DIV/0!
	Jan-01	0	0	#DIV/0!	2.97%	#DIV/0!
	Feb-01	0	0	#DIV/0!	4.12%	#DIV/0!
	Mar-01	0	0	#DIV/0!	3.83%	#DIV/0!



No Field Work (Original Data)						
Measurement 35 - 10	No. of Orders	All CLECs		SWBT		Z-Value
		# Trouble Reports	% Trouble Reports	% Trouble Reports		
Apr-00	0	1	n/a	5.59%		n/a
May-00	0	0	n/a	4.52%		n/a
Jun-00	0	0	n/a	5.29%		n/a
Jul-00	0	1	n/a	5.76%		n/a
Aug-00	0	0	n/a	6.16%		n/a
Sep-00	0	0	n/a	6.24%		n/a
Oct-00	0	0	n/a	5.20%		n/a
Nov-00	0	0	n/a	5.16%		n/a
Dec-00	0	0	n/a	5.25%		n/a
Jan-01	0	0	n/a	4.63%		n/a
Feb-01	0	1	n/a	5.53%		n/a
Mar-01	0	0	n/a	5.41%		n/a

No Field Work (Revised Data)						
Measurement 35 - 10	No. of Orders	All CLECs		SWBT		Z-Value
		# Trouble Reports	% Trouble Reports	% Trouble Reports		
Apr-00	0	1	#DIV/0!	5.59%		#DIV/0!
May-00	0	0	#DIV/0!	4.52%		#DIV/0!
Jun-00	0	0	#DIV/0!	5.29%		#DIV/0!
Jul-00	0	1	#DIV/0!	5.76%		#DIV/0!
Aug-00	0	0	#DIV/0!	6.16%		#DIV/0!
Sep-00	0	0	#DIV/0!	6.24%		#DIV/0!
Oct-00	0	0	#DIV/0!	5.20%		#DIV/0!
Nov-00	0	0	#DIV/0!	5.16%		#DIV/0!
Dec-00	0	0	#DIV/0!	5.25%		#DIV/0!
Jan-01	0	0	#DIV/0!	4.63%		#DIV/0!
Feb-01	0	1	#DIV/0!	5.53%		#DIV/0!
Mar-01	0	0	#DIV/0!	5.41%		#DIV/0!

**Percent Trouble Reports on C Orders within 10 days  
Field Work (Original Data)**

Measurement 35 - 11	No. of Orders	All CLECs		SWBT		Z-Value
		# Trouble Reports	% Trouble Reports	% Trouble Reports		
Apr-00	140	13	9.29%	2.68%		4.49
May-00	197	5	2.54%	2.59%		-0.04
Jun-00	166	8	4.82%	3.28%		1.08
Jul-00	163	3	1.84%	2.89%		-0.79
Aug-00	194	6	3.09%	2.89%		0.16
Sep-00	212	13	6.13%	3.53%		1.95
Oct-00	201	16	7.96%	3.05%		3.73
Nov-00	234	4	1.71%	3.54%		-1.49
Dec-00	202	5	2.48%	2.80%		-0.27
Jan-01	330	12	3.64%	2.46%		1.29
Feb-01	244	15	6.15%	3.82%		1.77
Mar-01	270	14	5.19%	3.96%		0.98

**Percent Trouble Reports on C Orders within 10 days  
(Revised Data)**

Measurement 35 - 11	No. of Orders	All CLECs		SWBT		Z-Value
		# Trouble Reports	% Trouble Reports	% Trouble Reports		
Apr-00	140	14	10.00%	2.64%		5.00
May-00	197	6	3.05%	2.55%		0.42
Jun-00	166	9	5.42%	3.25%		1.52
Jul-00	163	3	1.84%	2.89%		-0.79
Aug-00	194	7	3.61%	2.87%		0.60
Sep-00	212	14	6.60%	3.50%		2.33
Oct-00	201	18	8.96%	2.99%		4.54
Nov-00	234	4	1.71%	3.54%		-1.49
Dec-00	202	6	2.97%	2.76%		0.18
Jan-01	330	13	3.94%	2.43%		1.65
Feb-01	244	16	6.56%	3.78%		2.11
Mar-01	270	15	5.56%	3.93%		1.30

No Field Work (Original Data)					
Measurement	All CLECs		SWBT		Z-Value
35 - 12	No. of	# Trouble	% Trouble	% Trouble	
	Orders	Reports	Reports	Reports	
Apr-00	1,218	28	2.30%	1.08%	4.08
May-00	1,443	10	0.69%	1.20%	-1.77
Jun-00	1,376	32	2.33%	1.38%	2.97
Jul-00	1,199	25	2.09%	1.47%	1.78
Aug-00	1,484	33	2.22%	1.45%	2.50
Sep-00	1,304	32	2.45%	1.48%	2.89
Oct-00	1,863	42	2.25%	1.23%	3.98
Nov-00	1,966	21	1.07%	1.22%	-0.63
Dec-00	2,458	25	1.02%	1.17%	-0.69
Jan-01	3,398	41	1.21%	1.10%	0.62
Feb-01	2,391	38	1.59%	1.68%	-0.36
Mar-01	2,471	42	1.70%	1.37%	1.42

No Field Work (Revised Data)					
Measurement	All CLECs		SWBT		Z-Value
35 - 12	No. of	# Trouble	% Trouble	% Trouble	
	Orders	Reports	Reports	Reports	
Apr-00	1,218	31	2.55%	1.08%	4.91
May-00	1,443	11	0.76%	1.20%	-1.52
Jun-00	1,376	35	2.54%	1.38%	3.67
Jul-00	1,199	28	2.34%	1.46%	2.50
Aug-00	1,484	36	2.43%	1.44%	3.15
Sep-00	1,304	35	2.68%	1.48%	3.58
Oct-00	1,863	46	2.47%	1.23%	4.82
Nov-00	1,966	23	1.17%	1.22%	-0.22
Dec-00	2,458	28	1.14%	1.17%	-0.13
Jan-01	3,398	45	1.32%	1.09%	1.28
Feb-01	2,391	42	1.76%	1.68%	0.28
Mar-01	2,471	46	1.86%	1.36%	2.12

**Trouble Report Rate Less I-Reports and Repeat Reports  
(Original Data)**

Measurement 37.1 - 03	All CLECs		SWBT		Z-Value
	Number of Lines	# Trouble Reports	Trouble Report Rate	Trouble Report Rate	
Apr-00	16,566	112	0.68%	1.57%	-9.21
May-00	19,590	170	0.87%	2.25%	-13.01
Jun-00	22,667	203	0.90%	2.59%	-16.00
Jul-00	25,265	218	0.86%	2.46%	-16.33
Aug-00	29,671	283	0.95%	2.35%	-15.66
Sep-00	31,881	240	0.75%	1.84%	-14.30
Oct-00	35,220	320	0.91%	1.77%	-12.14
Nov-00	37,807	260	0.69%	1.50%	-12.82
Dec-00	42,506	279	0.66%	1.25%	-10.84
Jan-01	46,009	359	0.78%	1.48%	-12.30
Feb-01	48,245	397	0.82%	1.78%	-15.71
Mar-01	50,653	448	0.88%	1.62%	-12.96

**Trouble Report Rate Less I-Reports and Repeat Reports  
(Revised Data)**

Measurement 37.1 - 03	All CLECs		SWBT		Z-Value
	Number of Lines	# Trouble Reports	Trouble Report Rate	Trouble Report Rate	
Apr-00	19,877	123	0.62%	1.38%	-9.15
May-00	23,557	187	0.79%	1.94%	-12.72
Jun-00	26,907	224	0.83%	2.21%	-15.30
Jul-00	29,566	240	0.81%	2.13%	-15.66
Aug-00	32,638	312	0.96%	2.35%	-16.61
Sep-00	35,069	264	0.75%	1.84%	-15.15
Oct-00	38,742	352	0.91%	1.77%	-12.85
Nov-00	41,588	286	0.69%	1.50%	-13.55
Dec-00	46,757	307	0.66%	1.25%	-11.45
Jan-01	50,610	395	0.78%	1.48%	-13.00
Feb-01	53,070	437	0.82%	1.78%	-16.63
Mar-01	55,718	493	0.88%	1.62%	-13.71

Trouble Report Rate (Original Data)					
Measurement 37 - 03	Number of Lines	All CLECs	SWBT		Z-Value
		# Trouble Reports	Trouble Report Rate	Trouble Report Rate	
Apr-00	18,070	161	0.89%	1.70%	-8.31
May-00	21,415	195	0.91%	2.34%	-13.68
Jun-00	24,461	266	1.09%	2.70%	-15.33
Jul-00	26,878	265	0.99%	2.59%	-16.33
Aug-00	29,671	356	1.20%	2.90%	-17.18
Sep-00	31,881	309	0.97%	2.30%	-15.63
Oct-00	35,220	411	1.17%	2.19%	-12.96
Nov-00	37,807	330	0.87%	1.84%	-13.82
Dec-00	42,506	359	0.84%	1.54%	-11.55
Jan-01	46,009	459	1.00%	1.79%	-12.65
Feb-01	48,245	511	1.06%	2.19%	-16.75
Mar-01	50,653	572	1.13%	2.04%	-14.28

Trouble Report Rate (Revised Data)					
Measurement 37 - 03	Number of Lines	All CLECs	SWBT		Z-Value
		# Trouble Reports	Trouble Report Rate	Trouble Report Rate	
Apr-00	19,877	177	0.89%	1.70%	-8.80
May-00	23,557	215	0.91%	2.35%	-14.51
Jun-00	26,907	293	1.09%	2.70%	-16.29
Jul-00	29,566	292	0.99%	2.60%	-17.34
Aug-00	32,638	392	1.20%	2.91%	-18.29
Sep-00	35,069	340	0.97%	2.30%	-16.59
Oct-00	38,742	452	1.17%	2.19%	-13.75
Nov-00	41,588	363	0.87%	1.84%	-14.64
Dec-00	46,757	395	0.84%	1.55%	-12.21
Jan-01	50,610	505	1.00%	1.79%	-13.39
Feb-01	53,070	562	1.06%	2.20%	-17.78
Mar-01	55,718	629	1.13%	2.04%	-15.15

Repeat Reports (Original Data)					
Measurement	All CLECs			SWBT	Z-Value
41 - 03	# Trouble Reports	# Repeat Reports	% Repeat Reports	% Repeat Reports	
Apr-00	146	7	4.79%	8.39%	-1.56
May-00	185	9	4.86%	8.73%	-1.86
Jun-00	252	23	9.13%	9.83%	-0.37
Jul-00	251	18	7.17%	9.48%	-1.25
Aug-00	338	34	10.06%	10.22%	-0.10
Sep-00	295	24	8.14%	10.03%	-1.08
Oct-00	381	33	8.66%	10.42%	-1.12
Nov-00	318	45	14.15%	9.60%	2.74
Dec-00	337	49	14.54%	9.52%	3.12
Jan-01	421	47	11.16%	8.36%	2.06
Feb-01	473	60	12.68%	10.08%	1.87
Mar-01	536	68	12.69%	10.50%	1.64

Repeat Reports (Revised Data)					
Measurement	All CLECs			SWBT	Z-Value
41 - 03	# Trouble Reports	# Repeat Reports	% Repeat Reports	% Repeat Reports	
Apr-00	161	8	4.97%	8.39%	-1.56
May-00	204	10	4.90%	8.73%	-1.94
Jun-00	278	25	8.99%	9.83%	-0.47
Jul-00	277	20	7.22%	9.49%	-1.28
Aug-00	372	37	9.95%	10.22%	-0.17
Sep-00	325	26	8.00%	10.03%	-1.22
Oct-00	419	36	8.59%	10.42%	-1.22
Nov-00	350	50	14.29%	9.60%	2.96
Dec-00	371	54	14.56%	9.51%	3.28
Jan-01	463	52	11.23%	8.36%	2.22
Feb-01	520	66	12.69%	10.08%	1.97
Mar-01	589	75	12.73%	10.50%	1.75



**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of )  
)  
Application by SBC Communications Inc., )  
Southwestern Bell Telephone Company, and )  
Southwestern Bell Communications Services, ) CC Docket No. 01-88  
Inc. d/b/a Southwestern Bell Long Distance for )  
Provision of In-Region, InterLATA Services in )  
Missouri )

STATE OF TEXAS )  
)  
COUNTY OF TARRANT )

**REPLY AFFIDAVIT OF WILLIAM C. DEERE**

**TABLE OF CONTENTS  
NETWORK AFFIDAVIT**

<b>SUBJECT</b>	<b>PARAGRAPH</b>
PROFESSIONAL EXPERIENCE AND EDUCATIONAL BACKGROUND	1
REPLY TO COMMENTS OF SCC COMMUNICATIONS CORP.	2

I, WILLIAM C. DEERE, being of lawful age and duly sworn upon my oath, do hereby  
depose and state:

**Professional Experience and Educational Background**

1. My name is William C. Deere. I am a consultant for Southwestern Bell Telephone Company ("SWBT"). I previously filed an affidavit in this proceeding.



## **Reply to Comments of SCC Communications Corp**

2. SCC Communications Corp. (“SCC”) has filed comments and the affidavit of Ms.

Cynthia Clugy with the FCC concerning SWBT’s provisioning of E9-1-1 Service in Missouri. The following information is provided in response to a great many inaccuracies in SCC’s filing.

3. Beginning at page three of its comments, SCC claims that SBC accesses the 9-1-1 database on different terms and conditions than does its competitors.<sup>1</sup> SCC complains that:

[C]ompetitors may submit subscriber data electronically to SWBT (in its capacity of an incumbent 9-1-1 database management provider) periodically throughout the day, but competitive carriers do not have the ability to update the 9-1-1 database in this way. This is because SWBT controls the frequency with which uploading of those records occurs. However, SWBT in its capacity of a local exchange carrier may submit its own subscriber data to the SWBT 9-1-1 database management system in a continuous fashion via its OSS Customer Record Information System (“CRIS”). Thus, while SWBT’s subscriber records may be processed on an ongoing basis (real-time or batch mode), records submitted by other providers are processed at intervals determined by SWBT. The competitive providers have no choice about the process. SBC has the capability to, and should, make the option of continuous 9-1-1 database record management available to competitors.

4. SCC and Ms. Clugy are mistaken in their descriptions of the manner in which SWBT updates the 9-1-1 database.<sup>2</sup> SWBT processes all 9-1-1 updates in a batch mode. Competitors may submit updates to SWBT up to 10 times per day. Update files are processed within 1 minute of receipt. SWBT, itself, sends only 2 batch update files

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<sup>1</sup> Ms. Clugy presents the same argument at paragraphs 5 and 6 of her affidavit.

<sup>2</sup> SWBT reads SCC’s claims regarding competitive carriers’ updates to the 9-1-1 database as separate from its claim at pages 5 and 6 of its comments that SBC does not meet its obligation to make listing information available to unaffiliated entities on a nondiscriminatory basis. The latter matter, which involves the provision of information to SCC and other 911 providers, is addressed by the affidavit of Linda G. Yohe.

per day (at 6:00 PM and 3:00 AM, respectively) from the Service Order Retrieval and Distribution (“SORD”) System to the 9-1-1 system for processing.<sup>3</sup> There is no “real-time” or “continuous” mode of updating the 9-1-1 database as suggested by SCC and Ms. Clugy.

5. A CLEC may take a customer order at 9:15 AM and submit a batch process at 9:30 AM. The files will be updated within one minute, and the confirmation of that change (or an error report) will be available to the CLEC within five minutes. In contrast, a SWBT customer representative may receive a change from a customer at 9:15 AM, and the record will not be updated until 6:00 PM that night, and error reports will not be processed until the next morning.
6. This is the same process for updating the 9-1-1 database that has been approved and implemented in Texas, Kansas and Oklahoma.
7. Beginning on page four of its comments, SCC claims that “SWBT also has the capability of being notified immediately by its 9-1-1 group (not a separate affiliate) of subscriber records that do not correspond to the Master Street Address Guide (“MSAG”), and SWBT may therefore correct and resubmit such records without delay. In contrast, CLECs submitting data to SWBT’s 9-1-1 database management system are notified of subscriber record errors once daily.”<sup>4</sup>
8. Again SCC and Ms. Clugy are mistaken. Error files are available immediately after the update file is processed. Thus, CLECs submitting data to SWBT may access their

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<sup>3</sup> One other batch update is made at midnight from the Customer Record Information System (“CRIS”)

<sup>4</sup> Ms. Clugy makes the same claim at paragraph 6 of her affidavit.

error data at the completion of batch processing just as SWBT may. The number and frequency of update files processed by SWBT per day (up to a maximum of 10) is at the discretion of the CLEC.

9. This is the same process for correcting errors to the 9-1-1 database that has been approved and implemented in Texas, Kansas and Oklahoma.
10. At the bottom of page four of its comments, SCC claims that: “the 9-1-1 group at SWBT has direct access to SWBT’s source systems so as to expedite the error correction process for SWBT’s records; however, SWBT does not allow the same access to a competitor (or a third party 9-1-1 database manager acting on behalf of a competitor).”<sup>5</sup>
11. It is not clear what “source systems” SCC is referring to in this allegation. However, as described in my initial affidavit in Section VI, all data flows through the same processes and computers for the CLECs and SWBT. As previously discussed, a batch process is employed to update the databases, and the same process is used for SWBT and CLEC records.
12. Beginning on page five of its comments, SCC claims that: “SWBT has the capability at any time to compare its local exchange records against what data is in the 9-1-1 database that it controls, whereas competitors are denied that access and instead are typically provided with access only once per quarter. Any requests outside this

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<sup>5</sup> Ms. Clugy repeats this claim at paragraph 8 of her affidavit.

parameter are chargeable to the competitor which is obviously not the way SWBT treats itself.”<sup>6</sup>

13. As described at paragraph 205 of my initial affidavit, SWBT provides the CLECs with an update record each time the CLEC submits records. If a record is determined to contain errors, SWBT provides the CLEC a response that helps identify the problem. SWBT makes available on a monthly basis an electronic “compare file” that contains the subscriber information stored in the 9-1-1 database for end-user customers served by the CLEC. In addition, SWBT has completed testing with a CLEC in Oklahoma for “direct-view-only” access to CLECs in SWBT’s 9-1-1 database. The CLECs’ viewing access to telephone numbers is limited to those records in the 9-1-1 database with the CLECs’ official National Emergency Number Association (“NENA”) ID. This precludes personnel from one company from viewing the subscriber records of any other company. The CLECs may also view the MSAG. This “direct-view-only” capability will be available to all CLECs by the end of May 2001.

14. SCC’s footnote 8 claims, “SCC has provided SBC with direct-view-only access to SCC’s database management platform in order to allay SBC’s concerns. SBC, however, has refused to provide SCC or any other provider reciprocal access.”<sup>7</sup>

15. This footnote and Ms. Clugy’s statement are rather self-serving, because there are no records in SWBT’s 9-1-1 database with an SCC NENA ID. This is because SCC is

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<sup>6</sup> Ms. Clugy addresses this issue at paragraph 9 of her affidavit.

<sup>7</sup> Ms. Clugy makes this same claim at paragraph 8 of her affidavit.

not a CLEC serving end-user customers whose records would be stored in the 9-1-1 databases. If SCC were a CLEC serving end-user customers, it could have “direct-view-only” access – just like all other CLECs.

16. At page six of its comments, SCC states that: “[f]ollowing SCC’s selection over SBC by CSEC [Commission on State Emergency Communications] as the designated 9-1-1 database management services provider in Texas, SBC has been less than cooperative, and in some instances has obstructed, SCC’s efforts to perform its obligations under the Texas contract. For example, SBC refused to allow SCC access to SWBT’s selective routers so that SCC could fulfill its contractual obligations with CSEC to provide real time selective routing updates, which in turn caused CSEC to ask the Texas Public Utility Commission to intervene. The matter is still pending due to stipulated continuances to allow time for resolution by the parties.”

17. SWBT has worked, and continues to work, in good faith to resolve issues surrounding SCC’s provision of 9-1-1 service in Texas. SCC’s statements that SWBT has been “less than cooperative” and that SWBT has obstructed SCC’s efforts are demonstrably false. Unfortunately, some alleged “contractual obligations” were entered into by SCC and CSEC, which involve selective routing, without the knowledge or consent of SWBT. These alleged “contractual obligations,” if adhered to, would require SWBT to potentially jeopardize the timely completion of the 9-1-1 call. As noted, these issues continue to be negotiated between the parties.

18. On page six of its comments, SCC continues: “[a]dditionally, SBC’s local provider affiliate, SWBT, failed to offer an appropriate tariff in Texas. Instead, SWBT

proposed new tariffs that would, in effect, punish PSAPs for selecting SCC over SWBT as their 9-1-1 database management services provider.”

19. SCC’s claim is demonstrably false. SWBT filed a new, unbundled tariff for 9-1-1 services in compliance with – and at the direction of – the Public Utilities Commission of Texas (“PUCT”). At this time, SWBT’s new tariff, as well as the new tariffs required of other LECs in Texas, are being reviewed by the PUCT.
20. Ms. Clugy claims at paragraph 7 of her affidavit that SWBT has an advantage over competitive service providers, because it has revenues from E9-1-1 service to cover its costs associated with the Data Integrity Unit that the competitors do not have. She also claims that SBC has the ability to support and subsidize operational functions of local exchange provisioning through E9-1-1 rates.
21. A competitive service provider such as SCC will also have revenues from its provisioning of E9-1-1 services. It is free to establish its rates in such a way as to recover all of its costs, including data correction costs. SWBT’s rates for E9-1-1 services are established by the Public Service Commission, Public Utility Commission, or Corporation Commission of each state that SWBT serves. These Commissions fully understand that SWBT provides E9-1-1 service as a public safety concern and therefore the costs do not include any ability to subsidize local exchange operations.
22. At paragraph ten of her affidavit, Ms. Clugy claims that: “the M2A is fundamentally flawed for it does not contemplate a competitive market for 9-1-1 services.” She also complains that the M2A does not address certain services that support competitive 9-

1-1 services, such as ALI Steering and Dynamic ALI Updates. ALI Steering and Dynamic ALI Updates services are crucial in order to provide PSAPs access to subscriber records that reside in competitor's database.

23. The M2A is not designed as a contract for competitive 9-1-1 service providers such as SCC. It is designed as a contract for Competitive Local Exchange Carriers just as the T2A is in Texas where SCC has a different contract with SWBT.<sup>8</sup> This separate Texas contract includes many features and provisions not found in the M2A because it is specifically designed for a 9-1-1 service providers such as SCC.

24. This concludes my affidavit.

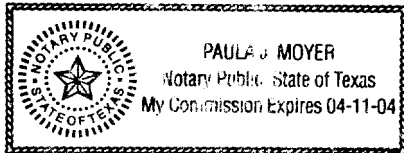
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<sup>8</sup> Interoperability Agreement No. 00008318 Between SCC Communications Corp. and Southwestern Bell Telephone Company Regarding 9-1-1 Services In Texas (Feb. 2, 2000).

I hereby swear and affirm that the information contained in the attached affidavit is true and correct to the best of my knowledge and belief.

William C. Deere  
William C. Deere

Subscribed and sworn to before me on this 19<sup>th</sup> day of May 2001.



Paula J. Moyer  
Notary Public